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May 18, 2018

VIA ECF
Hon. Anny Y. Shields
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Wisdom v. County of Nassau
16-CV-01728 (DRH)(AYS)

Dear Magistrate Judge Shields:

This office represents defendants, County of Nassau, the Nassau County Police Department, Det. Charles Pentola, Det. Raymond Butterworth, P.O. Victor Gladitz, P.O. Kerri Ann Hoover, P.O. Jorge Diaz, Sgt. Vincent Papa, P.O. Charles Volpe, P.O. Tanya Tucker, P.O. John Monell, Sgt. Kenneth Catalani, Det. Roy McComb, Det. G. Umbarila, P.O. Erik Diaz, and Lt. Adam Scheiner in the above-referenced action. The purpose of this letter is to report on recent developments in discovery, as directed by the Court.

Yesterday, May 17, 2018 the Nassau County Police Indemnification Board (the "Board") convened, and voted to indemnify all defendant officers in the action. As a result, the parties may begin to conduct depositions. Plaintiff has identified the following five officers to be deposed in the first round: Police Officer Victor Gladitz, Police Officer Kerri Ann Hoover, Detective Charles Pentola, Police Officer Charles Volpe and Police Officer Jorge Diaz. As the Board voted just yesterday, I am now in the process of contacting these five officers to schedule dates for their depositions. I will report to the Court as to the specific dates of the depositions once I have secured the dates with the officers and with plaintiff's counsel.

As always, defendants thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman

RALPH J. REISSMAN

Deputy County Attorney

cc: Finz & Finz, Attorneys for Plaintiff (via ECF)